IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WESMINSTER INSURANCE COMPANY, *et al.*	
Plaintiffs,	
v.	No. 2:20-cv-02195-JRP
SECURITY NATIONAL INSURANCE COMPANY,	
Defendant.	

PLAINTIFFS' MOTION FOR LEAVE TO FILE A SURREPLY IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS

Plaintiffs, by and through their counsel, Saltz Mongeluzzi & Bendesky, P.C., hereby move for leave to file a Surreply in Opposition to the Motion to Dismiss of Defendant Security National Insurance Company ("SNIC"), and aver as follows:

1.   This case arises from SNIC's bad faith refusal to defend its insureds in the face of a multi-million-dollar catastrophic personal injury claim.

2.   On July 27, 2020, SNIC filed a Motion to Dismiss Plaintiffs' Second Amended Complaint. *See* ECF Doc. No. 41.

3.   Plaintiffs filed a Response in Opposition on August 26, 2020. *See* ECF Doc. No. 45.

4.   SNIC filed a Brief in Reply on September 2, 2020. *See* ECF Doc. No. 48.

5.   Plaintiffs now request leave to file a Surreply in Opposition to SNIC's Motion to Dismiss because rules of Pennsylvania contract interpretation and common law refute the arguments raised in SNIC's Reply that Altman Management Co. is an additional insured by virtue of its inclusion in the Schedule of the Blanket Additional Insured Endorsement.

6.   Further, there are numerous disputed issues of fact raised in SNIC's Reply that require discovery and mandate denial of SNIC's Motion.

7.   Plaintiffs' proposed Surreply is attached in full hereto as Exhibit "A."

WHEREFORE, Plaintiffs respectfully request that this Honorable Court permit Plaintiffs to file the attached Surreply.

Respectfully submitted,

Dated: September 11, 2020   */s/ Robert J. Mongeluzzi*
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